

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RLP VENTURES LLC.)	
)	
Plaintiff,)	
)	Civ. No. 1:18-cv-03988
v.)	
)	NOTICE OF
ALL HANDS INSTRUCTION NFP)	DEFENDANT
)	ALL HANDS INSTRUCTION NFP'S
Defendant,)	MOTION TO DISMISS OR TO
)	TRANSFER VENUE

PLEASE TAKE NOTICE that upon accompanying Declaration of Kevin J. Post, the accompanying Declaration of Jerome Green, and the accompanying memorandum of law, Defendant All Hands Instruction NFP ("All Hands"), by and through its attorneys, will move this Court before the Honorable Robert W. Sweet, at the court Courthouse located at 500 Pearl Street, New York, New York, 10007, on Wednesday, August 22, 2018, at 12:00pm, for an order dismissing this case for lack of personal jurisdiction and improper venue, or in the alternative, transferring this action to the United States District Court for the Northern District of Illinois pursuant to Fed. R. Civ. P. Rules 12(b)(2) and (3), and 28 U.S.C. §§ 1404(a) and 1406(a). In the alternative, All Hands respectfully moves this Court for an order dismissing willful federal trademark infringement, willful federal unfair competition, and willful common law trademark infringement in Counts one through three and the entirety of Count four of Plaintiff RLP Ventures LLC's Complaint and Jury Demand for failure to state a claim under Rule 12(b)(6), Fed R. Civ. P.

Dated: July 30, 2018

/s/Kevin J. Post
Kevin J. Post
ROPES & GRAY LLP
1211 Avenue of the Americas
New York, NY 10036
(212) 596-9000

Attorneys for Defendant
All Hands Instruction NFP